

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

**CLEVELAND BROWNS FOOTBALL
COMPANY LLC,**

**CLEVELAND BROWNS STADIUM
COMPANY LLC,**

HASLAM SPORTS GROUP, LLC,

JHAC, LLC,

Plaintiffs,

vs.

THE CITY OF CLEVELAND,

MARK D. GRIFFIN, in his official capacity,

Defendants,

THE STATE OF OHIO,

Intervenor-Defendant.

Case No. 1:24-CV-01857-DAR

Judge David A. Ruiz

STIPULATION AND [PROPOSED] ORDER

Plaintiffs Cleveland Browns Football Company LLC, Cleveland Browns Stadium Company LLC, Haslam Sports Group, LLC, and JHAC, LLC (collectively, the “Browns”), Defendants the City of Cleveland and Mark D. Griffin, in his official capacity (collectively, the “City”), and Intervenor-Defendant the State of Ohio (the “State” and together with the Browns and

the City, the “Parties”) jointly submit this Stipulation and [Proposed] Order and in support thereof state as follows:

WHEREAS, on June 30, 2025, the Court partially granted the City’s Motion to Hold Deadlines in Abeyance and stayed this action until further order of the Court;

WHEREAS, on July 31, 2025, the Court held a status conference to discuss the efficient case management of the action and set a follow-up status conference for August 6, 2025 at 2 p.m. to address issues including setting a revised briefing schedule for defendants’ renewed motions to dismiss and time-frame for setting a case management conference, and further providing that if the Parties reach agreement on those issues, they may submit a joint proposal prior to the status conference;

WHEREAS, the Parties have conferred on the issues to be addressed at the status conference;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties by and through their respective counsel and subject to the approval of the Court, that:

1. The stay of this action ordered on June 30, 2025 is hereby lifted.
2. [Subject to determination of the Court’s availability] The case management conference is set for September [9], 2025 at [10 a.m.].
3. The City and the State shall file any renewed motions to dismiss the Second Amended Complaint by September 12, 2025.
4. The Browns shall file any briefs in opposition to the City’s and the State’s renewed motions to dismiss within 30 days after service of the motions to dismiss.
5. The City and the State shall file any replies in support of their renewed motions to dismiss within 14 days after service of the Browns’ briefs in opposition.

6. The City's and State's Answers shall be due, if at all, 14 days after the Court rules on the renewed motion to dismiss.
7. [The status conference set for August 6, 2025 is cancelled.]

IT IS SO ORDERED.

DATED: _____, 2025

David A. Ruiz
United States District Judge

Respectfully submitted,

/s/ Anthony C. White

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on August 6, 2025, and counsel of record will receive a notice of filing through the Court's electronic filing system in accordance with Fed. R. Civ. P. 5(b)(2)(E) and this Court's Local Rules.

/s/ Anthony C. White

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One of the Attorneys for Plaintiffs